

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case NO. 3:16-cr-26
Plaintiff,		
v.	:	JUDGE THOMAS M. ROSE
ROBERT S. JONES,	:	<u>NOTICE OF</u>
Defendant.		<u>INSANITY DEFENSE</u>

Now comes the Defendant, **ROBERT S. JONES**, through his attorneys, **RION, RION & RION, L.P.A., INC.**, and pursuant to Rule 12.2(a) of the Federal Rules of Criminal Procedure hereby provides notice to the Government of his intent to rely upon the defense of insanity:

1. Defendant had a severe mental disease or defect at the time of this offense – bipolar disorder, post-traumatic stress disorder, depressive disorder with psychotic features; and as a result of the disease or defect he was “unable to appreciate the nature and quality or the wrongfulness of his acts.” 18 U.S.C. §17.
2. This notice was filed as soon as was practicable – undersigned counsel acted with all due haste once the information giving rise to this defense was learned then verified through a third party.
3. Defendant does not object to the granting of additional trial-preparation time on behalf of the Government based on this notice.

Respectfully submitted,

/s/ Jon Paul Rion
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the Defendant's Notice of Intent to Rely Upon the Defense of Insanity was sent to the office of the United States Attorney in the Southern District of Ohio through electronic filing.

/s/ Jon Paul Rion
JON PAUL RION
RION, RION & RION, L.P.A., INC.